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September 30, 2014

**VIA CM/ECF**

Hon. Esther Salas, U.S.D.J.  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

Re: *WAG Acquisition, L.L.C. v. Sobonito Investments, Ltd.; et al.*  
Civil Action No. 2:14-cv-01661 (ES)(JAD)

*WAG Acquisition, LLC v. Multi Media, LLC et al.*  
Civil Action No. 2:14-cv-02340 (ES)(JAD)

*WAG Acquisition, L.L.C. v. Data Conversions, Inc. et al.*  
Civil Action No. 2:14-cv-02345 (ES)(JAD)

*WAG Acquisition, L.L.C. v. Flying Crocodile, Inc. et al.*  
Civil Action No. 2:14-cv-02674 (ES)(MAH)

*WAG Acquisition, L.L.C. v. Gattyan Group S.a.r.l. et al.*  
Civil Action No. 2:14-cv-02832 (ES) (JAD)

*WAG Acquisition, L.L.C. v. MFCXY, Inc. et al.*  
Civil Action No. 2:14-cv-03196 (ES)(MAH)

*WAG Acquisition, L.L.C. v. FriendFinder Networks Inc. et al.*  
Civil Action No. 2:14-cv-03456 (ES)(JAD)

*WAG Acquisition, L.L.C. v. Vubeology, Inc. et al.*  
Civil Action No. 2:14-cv-04531 (ES)(JAD)

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Your Honor:

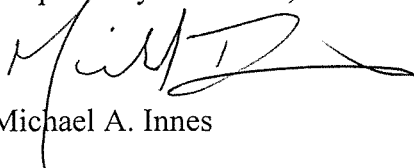
We represent defendant Coolvision, Ltd. ("Coolvision") in *WAG Acquisition, L.L.C. v. Sobonito Investments, Ltd., et al.*, Civil Action No. 2:14-cv-01661 (ES)(JAD), and write on behalf of all parties in each of the above captioned actions ("the *WAG* actions").

On September 29, 2014, the Court held a telephone conference in the *WAG* actions. At the Court's suggestion, all parties that have appeared in the *WAG* actions consent to consolidation of the same for discovery purposes only. The Court acknowledged that such consolidation may need to be adjusted in cases where not all parties have been served.

Furthermore, on or before Monday, October 6, 2014, the parties shall submit a joint proposed briefing schedule for a joint motion to dismiss to be filed in accordance with the "old" Appendix N to the Local Civil Rules of the District of New Jersey. The Court confirmed during the above-referenced conference that all disclosure and discovery in the *WAG* actions would be stayed pending final disposition of the aforementioned joint motion to dismiss.

If the above meets with Your Honor's approval, we respectfully ask that the Court "so order" this letter, and thereby (1) consolidate the *WAG* actions for discovery purposes only, and (2) adjourn the Scheduling Conference set for November 5, 2014 to a date following a decision on the joint motion to dismiss.

Respectfully submitted,



Michael A. Innes

SO ORDERED: \_\_\_\_\_

Hon. Esther Salas, U.S.D.J.

MAI/cm

cc: ALL COUNSEL OF RECORD (via email)